

9/13

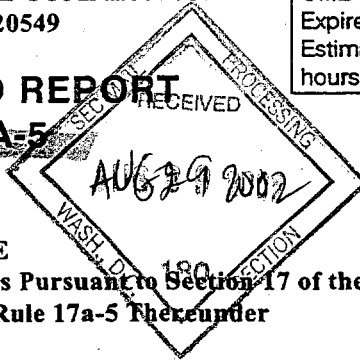
9/3/2002

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549



02054069

ANNUAL AUDITED REPORT
FORM X-17A-5
PART III



OMB APPROVAL	
OMB Number:	3235-0123
Expires:	October 31, 2001
Estimated average burden	hours per response..... 12.00

SEC FILE NUMBER
8- 37613

FACING PAGE
Information Required of Brokers and Dealers Pursuant to Section 17 of the
Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING 07/01/01 AND ENDING 06/30/02
MM/DD/YY MM/DD/YY

A. REGISTRANT IDENTIFICATION

NAME OF BROKER-DEALER:

OFFICIAL USE ONLY
FIRM I.D. NO.

FIRST WESTERN SECURITIES, INC.
ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)

669 AIRPORT FREEWAY, SUITE 409
(No. and Street)
FORT WORTH TEXAS 76182-0159
(City) (State) (Zip Code)

NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT
RANDY FERGUSON (817) 553-1492
(Area Code - Telephone Number)

B. ACCOUNTANT IDENTIFICATION

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report*

SANFORD, BAUMEISTER & FRAZIER, P.C.
(Name - if individual, state last, first, middle name)
201 MAIN STREET, SUITE 1250 FORT WORTH TEXAS 76102
(Address) (City) (State) (Zip Code)

CHECK ONE:

- ☒ Certified Public Accountant
☐ Public Accountant
☐ Accountant not resident in United States or any of its possessions.

PROCESSED

SEP 18 2002

THOMSON
FINANCIAL

FOR OFFICIAL USE ONLY

*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

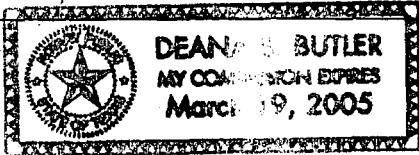
[Handwritten signature]

SEC 1410 (05-01)

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

OATH OR AFFIRMATION

I, RANDY FERGUSON, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of FIRST WESTERN SECURITIES, INC., as of JUNE 30, 2002, are true and correct. I further swear (or affirm) that neither the company nor any partner, proprietor, principal officer or director has any proprietary interest in any account classified solely as that of a customer, except as follows:



Dean S. Butler

Notary Public

Randy E. Ferguson
Signature
PRESIDENT
Title

This report ** contains (check all applicable boxes):

- ☒ (a) Facing Page.
- ☒ (b) Statement of Financial Condition.
- ☒ (c) Statement of Income (Loss).
- ☒ (d) Statement of Changes in Financial Condition. (SEE STATEMENT OF CASH FLOWS)
- ☒ (e) Statement of Changes in Stockholders' Equity or Partners' or Sole Proprietors' Capital.
- ☐ (f) Statement of Changes in Liabilities Subordinated to Claims of Creditors. (NOT APPLICABLE)
- ☒ (g) Computation of Net Capital.
- ☒ (h) Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.
- ☐ (i) Information Relating to the Possession or Control Requirements Under Rule 15c3-3. (NOT APPLICABLE)
- ☐ (j) A Reconciliation, including appropriate explanation of the Computation of Net Capital Under Rule 15c3-3 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3. (NOT APPLICABLE)
- ☐ (k) A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of consolidation. (NOT APPLICABLE)
- ☒ (l) An Oath or Affirmation.
- ☐ (m) A copy of the SIPC Supplemental Report. (NO LONGER REQUIRED)
- ☒ (n) A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit. (AUDITORS' REPORT ON INTERNAL CONTROL STRUCTURE REQUIRED BY SEC RULE 17A-5)

**For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

FIRST WESTERN SECURITIES, INC.

FINANCIAL STATEMENTS AND AUDITORS' REPORT

FOR THE YEAR ENDED JUNE 30, 2002

FIRST WESTERN SECURITIES, INC.
CONTENTS
JUNE 30, 2002

	<u>Page</u>
INDEPENDENT AUDITORS' REPORT	1
AUDITED FINANCIAL STATEMENTS	
Statement of Financial Condition	2
Statement of Income	3
Statement of Changes in Stockholders' Equity	4
Statement of Cash Flows	5
Notes to Financial Statements	6
SUPPLEMENTARY INFORMATION	
Computation of Net Capital Under Rule 15c3-1 of the Securities and Exchange Commission.....	9
Computation for Determination of Reserve Requirements Under Rule 15c3-3 of the Securities and Exchange Commission	10
INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL STRUCTURE REQUIRED BY SEC RULE 17A-5	11



Members:

American Institute of CPAs

Texas Society of CPAs

Fort Worth Chapter of CPAs

SEC Practice Section

Experienced with
a wide variety of
industries including:
Oil & gas

Home builders

Retail

Manufacturing

Health Care

Contractors

Financial institutions

Law firms

Insurance agencies

Real estate investors &
developers

Closely held businesses

Nonprofit organizations

**The services you
need to prosper:**

Management consulting

Year-round tax planning

Business & individual
tax preparation

Audits

Financial reporting

IRS representation

Business valuation

Employee benefit plans

Retirement & estate
planning

Revenue distribution

Joint interest billings

Bookkeeping

August 23, 2002

Board of Director and Shareholders

First Western Securities, Inc.

Fort Worth, Texas

Independent Auditors' Report

We have audited the accompanying statement of financial condition of First Western Securities, Inc. as of June 30, 2002, and the related statements of income, changes in stockholders' equity and cash flows for the year then ended that you are filing pursuant to rule 17a-5 under the Securities Exchange Act of 1934. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of First Western Securities, Inc. as of June 30, 2002, and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

Our audit was conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The accompanying supplementary information in Schedules I and II is presented for purposes of additional analysis and is not a required part of the basic financial statements, but is supplementary information required by Rule 17a-5 under the Securities and Exchange Act of 1934. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in our opinion, is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

Sanford, Baumeister & Frazier, P.C.

SANFORD, BAUMEISTER & FRAZIER, P.C.

FIRST WESTERN SECURITIES, INC.
STATEMENT OF FINANCIAL CONDITION
JUNE 30, 2002

ASSETS

Cash in bank	\$ 25,766
Money market mutual fund	16,774
Commissions receivable	74,186
Federal income tax receivable - Note 6	75,460
Clearing deposits - Note 3	<u>58,158</u>

<u>TOTAL ASSETS</u>	<u>\$ 250,344</u>
----------------------------	--------------------------

LIABILITIES AND STOCKHOLDERS' EQUITY

LIABILITIES

Commissions and wages payable	\$ 25,421
Commissions payable to independent agents	57,227
Accrued accounts payable	<u>1,618</u>

Total Liabilities	\$ 84,266
-------------------	-----------

STOCKHOLDERS' EQUITY - Note 4

Common stock, \$.01 par value, 1,200,000 shares authorized, 942,974 shares issued and outstanding	9,534
Additional paid-in capital	35,328
Retained earnings	<u>121,216</u>

Total Stockholders' Equity	<u>166,078</u>
----------------------------	----------------

<u>TOTAL LIABILITIES AND STOCKHOLDERS' EQUITY</u>	<u>\$ 250,344</u>
--	--------------------------

The accompanying notes to financial statements
are an integral part of these statements.

FIRST WESTERN SECURITIES, INC.
STATEMENT OF INCOME
FOR THE YEAR ENDED JUNE 30, 2002

REVENUES

Commissions	\$ 1,661,797	
Interest income and investment losses - Note 3	<u>(12,565)</u>	
Total Revenues		\$ 1,649,232

EXPENSES

Employee compensation - Note 8	490,799	
Clearing charges	157,102	
Independent agent commissions	892,409	
Other operating expenses - Notes 5 and 7	<u>206,940</u>	
Total Expenses		<u>1,747,250</u>

(LOSS) BEFORE FEDERAL INCOME TAX (98,018)

FEDERAL INCOME TAX BENEFIT - Note 6 44,124

NET (LOSS) \$ (53,894)

The accompanying notes to financial statements
are an integral part of these statements.

FIRST WESTERN SECURITIES, INC.
STATEMENT OF CHANGES IN STOCKHOLDERS' EQUITY
FOR THE YEAR ENDED JUNE 30, 2002

	<u>Common Stock</u>	<u>Additional Paid-in Capital</u>	<u>Retained Earnings</u>	<u>Total Stockholders' Equity</u>
<u>BALANCE</u> - June 30, 2001	\$ 9,534	\$ 35,328	\$ 175,110	\$ 219,972
Net loss			(53,894)	(53,894)
<u>BALANCE</u> - June 30, 2002	<u>\$ 9,534</u>	<u>\$ 35,328</u>	<u>\$ 121,216</u>	<u>\$ 166,078</u>

The accompanying notes to financial statements
are an integral part of these statements.

FIRST WESTERN SECURITIES, INC.
STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED JUNE 30, 2002

INCREASE (DECREASE) IN CASH AND CASH EQUIVALENTS

CASH FLOWS FROM OPERATING ACTIVITIES

Net loss	\$ (53,894)
Adjustments to reconcile net loss to net cash used in operating activities:	
(Increase) decrease in operating assets:	
Commissions receivable	2,505
Securities owned - net	84,406
Federal income tax receivable	(72,861)
Clearing deposits	19,319
Deferred income taxes	28,737
Increase (decrease) in operating liabilities:	
Commissions and wages payable	(30,398)
Commissions payable to independent agents	45,936
Accrued accounts payable	(9,500)
Payable to clearing broker	(76,164)

Net Cash Used in Operating Activities	\$ (61,914)
---------------------------------------	-------------

NET DECREASE IN CASH AND CASH EQUIVALENTS

(61,914)

CASH AND CASH EQUIVALENTS - Beginning of Year

104,454

CASH AND CASH EQUIVALENTS - End of Year

\$ 42,540

The accompanying notes to financial statements
are an integral part of these statements.

FIRST WESTERN SECURITIES, INC.
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2002

NOTE 1 - ORGANIZATION AND OPERATIONS

First Western Securities, Inc. (the Company) was incorporated in Texas on March 27, 1987 and commenced business as a registered broker/dealer on July 7, 1987. The Company is registered with the Securities and Exchange Commission (SEC) and the National Association of Securities Dealers (NASD). The predominance of its customers live in Texas and a substantial portion of all transactions are cleared through clearing houses located in Texas.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The accounting and reporting policies of the Company conform with generally accepted accounting principles. Policies and practices that materially affect the determination of financial position, changes in financial position, and results of operations are summarized as follows:

CASH AND CASH EQUIVALENTS

For purposes of the statement of cash flows, the Company considers any short-term investment convertible to cash within three months or less with little or no change in the principal amount to be a cash equivalent. Cash and cash equivalents at June 30, 2002 consist of cash in bank and a money market mutual fund.

BAD DEBTS

The Company utilizes the allowance method for recognition of bad debts. For the year ended June 30, 2002, the Company recognized no bad debt expense. No allowance was deemed necessary as of June 30, 2002.

SECURITIES OWNED

Securities owned by the Company are held principally for resale in the near term. Therefore, these securities are classified as trading securities and recorded at their fair values. As of June 30, 2002 the Company did not own any securities. Unrealized gains and losses, as well as realized gains and losses, on these securities are included in the statement of income.

MUTUAL FUNDS

All of the mutual funds of the Company have been in publicly traded open-end mutual funds. The Company has classified these investments as trading securities for book purposes and available-for-sale securities for tax purposes. Therefore, these investments are reported at fair value at June 30, 2002. Unrealized gains and losses, as well as realized gains and losses, on these investments are included in the statement of income.

RECOGNITION OF COMMISSION REVENUE AND EXPENSE

The Company records commission income as earned, on the settlement date basis. Commission expense is recognized at the same time along with any related clearing expenses.

USE OF ESTIMATES

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

FIRST WESTERN SECURITIES, INC.
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2002

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - Continued

CONCENTRATION OF CREDIT RISK

The Company primarily utilizes one brokerage house to execute all of its customers' stock and bond transactions. The brokerage house remits the Company's commission on these trades monthly. Therefore, a substantial portion of the Company's commission receivable balance could be at risk at any point in time.

NOTE 3 - SECURITIES OWNED/CLEARING DEPOSITS

The Company had a trading account and an inventory account with First Union Securities, Inc. (clearing broker). The investments in these accounts were held principally for resale in the near term. Therefore, unrealized gains and losses on these securities are included in the statement of income. Net unrealized and realized losses for the year ended June 30, 2002 were \$52,706.

As of June 30, 2002 the Company does not have any securities that it owns in a trading or inventory account.

As of June 30, 2002, the Company has a combined balance of approximately \$58,158 on deposit with First Union Securities, Inc. and Southwest Securities, Inc. (its previous clearing broker). The Company was required to maintain a clearing deposit balance with these clearing brokers due to the utilization of the above-mentioned trading and inventory accounts as well as for the execution of investment trades.

NOTE 4 - NET CAPITAL REQUIREMENTS

The Company is subject to the Securities and Exchange Commission's "Uniform Net Capital" Rule (SEC Rule 15c3-1), which requires the maintenance of minimum net capital and requires that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1. At June 30, 2002, the Company had net capital of \$90,283 that was \$40,283 in excess of its required net capital of \$50,000. The Company's ratio of aggregate indebtedness to net capital was 0.93 to 1.

NOTE 5 - OPERATING LEASE

The Company is committed to leasing its present office location through June 30, 2009. The lease payments are guaranteed by one of the Company's shareholders. Lease expense for the year ended June 30, 2002 was \$48,037 and is included in other operating expenses on the statement of income.

The future minimum rental payments based upon the base amounts under the non-cancelable operating lease are as follows:

<u>Year Ending</u> <u>June 30,</u>	<u>Amount</u>
2003	\$ 36,398
2004	36,992
2005	37,586
2006	38,181
2007	38,775
Thereafter	<u>79,187</u>
Total	<u>\$ 267,119</u>

FIRST WESTERN SECURITIES, INC.
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2002

NOTE 6 - FEDERAL INCOME TAX

The Company had a federal income tax receivable of \$75,460 as of June 30, 2002 calculated as follows:

Loss per books and for tax purposes	\$ 98,018
Carryback of previous NOL's to prior years	<u>191,578</u>
Net Operating Loss Carryback Utilized	289,596
Effective tax rate	<u>25.16%</u>
Federal Income Tax Receivable due to NOL Utilization	72,861
Federal Income Tax Receivable from last year	<u>2,599</u>
Federal Income Tax Receivable	<u><u>\$ 75,460</u></u>

The federal income tax benefit for the year ended June 30, 2002 is reflected on the statement of income as follows:

Current	\$ 16,763
Benefit of Prior Year's NOL Carryback	<u>27,361</u>
Federal Income Tax Benefit	<u><u>\$ 44,124</u></u>

The Company has a "brother/sister controlled group" relationship with First Western Leasing, Inc. since five or fewer persons own at least 80% of the voting stock of each company.

NOTE 7 - RELATED PARTY TRANSACTIONS

During the current year, the Company subleased its furniture and office equipment under a month-to-month rental arrangement with First Western Leasing, Inc., a company related by common ownership. The Company is also charged fees by First Western Leasing, Inc. for services such as utilities, telephone, insurance coverage, and quotation services. The total fees paid by the Company to First Western Leasing, Inc. for these services during the year ended June 30, 2002 were \$97,463. This amount is included in other operating expenses on the statement of income. The fees paid by the Company to First Western Leasing, Inc. for these services are not necessarily considered to approximate their fair value.

NOTE 8 - EMPLOYEE BENEFIT PLAN

The Company adopted a 401(k) Profit Sharing Plan during the year ended June 30, 1993, whereby the employees may elect to make contributions pursuant to a salary reduction agreement upon meeting length of service requirements. The Company does not have a matching contribution obligation. During the year ended June 30, 2002, the Company elected to make a discretionary contribution in the amount of \$1,000.

SUPPLEMENTARY INFORMATION

SCHEDULE I

FIRST WESTERN SECURITIES, INC. COMPUTATION OF NET CAPITAL UNDER RULE 15c3-1 OF THE SECURITIES AND EXCHANGE COMMISSION JUNE 30, 2002

NET CAPITAL

Total stockholders' equity - book purposes	\$ 166,078
Deductions	<u>- 0 -</u>
Total Stockholders' Equity Qualified for Net Capital	166,078
Allowable credits	<u>- 0 -</u>
Total Capital and Allowable Credits	166,078
Deductions and/or Charges	
Non-allowable assets:	
Receivables from non-customers	<u>75,460</u>
Total Deductions and/or Charges	<u>75,460</u>
Net Capital Before Haircuts on Securities Positions	90,618
Haircuts on Securities	<u>335</u>
Net Capital	<u>\$ 90,283</u>

AGGREGATE INDEBTEDNESS

Commissions and wages payable	\$ 25,421
Commissions payable to independent agents	57,227
Accrued accounts payable	<u>1,618</u>
Total Aggregate Indebtedness	<u>\$ 84,266</u>

COMPUTATION OF BASIC NET CAPITAL REQUIREMENTS

Minimum net capital required pursuant to Rule 15c3-1	<u>\$ 50,000</u>
Excess net capital at 1000% (or \$50,000, whichever is greater)	<u>\$ 40,283</u>
Ratio of aggregate indebtedness to net capital	<u>.93 to 1</u>

RECONCILIATION WITH COMPANY'S COMPUTATION

(included in Part II of FORM X-17A-5 as of June 30, 2002)

Net Capital, as reported in Company's Part II (Unaudited) FOCUS report	\$ 121,619
Audit adjustment for federal income taxes	<u>(31,336)</u>
Net Capital per Above	<u>\$ 90,283</u>

SCHEDULE II

**FIRST WESTERN SECURITIES, INC.
COMPUTATION FOR DETERMINATION OF RESERVE
REQUIREMENTS UNDER RULE 15c3-3 OF THE
SECURITIES AND EXCHANGE COMMISSION
JUNE 30, 2002**

First Western Securities, Inc. is exempted from Rule 15c3-3 of the Securities and Exchange Commission by subparagraph (k)(2)(ii) of that rule, and as a result, the Computation for Determination of the Reserve Requirement under Exhibit A of Rule 15c3-3 is not required. No facts came to our attention to indicate that this exemption had not been complied with during the year ended June 30, 2002.



Members:

American Institute of CPAs

Texas Society of CPAs

Fort Worth Chapter of CPAs

SEC Practice Section

Experienced with
a wide variety of
industries including:
Oil & gas

Home builders

Retail

Manufacturing

Health Care

Contractors

Financial institutions

Law firms

Insurance agencies

Real estate investors &
developers

Closely held businesses

Nonprofit organizations

The services you
need to prosper:

Management consulting

Year-round tax planning

Business & individual
tax preparation

Audits

Financial reporting

IRS representation

Business valuation

Employee benefit plans

Retirement & estate
planning

Revenue distribution

Joint interest billings

Bookkeeping

August 23, 2002

Board of Director and Shareholders

First Western Securities, Inc.

Fort Worth, Texas

**INDEPENDENT AUDITORS' REPORT ON INTERNAL
CONTROL STRUCTURE REQUIRED BY SEC RULE 17a-5**

In planning and performing our audit of the financial statements and supplemental schedules of First Western Securities, Inc. (the "Company") for the year ended June 30, 2002, we considered its internal control structure, including control activities for safeguarding securities, in order to determine our auditing procedures for the purpose of expressing our opinion on the financial statements and not to provide assurance on the internal control structure.

Also, as required by Rule 17a-5(g)(1) of the Securities Exchange Commission (SEC), we have made a study of the practices and procedures followed by the Company, including tests of such practices and procedures that we considered relevant to the objectives stated in Rule 17a-5(g) in making the periodic computations of aggregate indebtedness (or aggregate debits) and net capital under Rule 17a-3(a)(11) and for determining compliance with the exemptive provisions of Rule 15c3-3. Because the Company does not carry securities accounts for customers or perform custodial functions relating to customer securities, we did not review the practices and procedures followed by the Company in any of the following:

1. Making quarterly securities examinations, counts, verifications, and comparisons.
2. Recordation of differences required by rule 17a-13.
3. Complying with the requirements for prompt payment for securities under Section 8 of Federal Reserve Regulation T of the Board of Governors of the Federal Reserve System.

The management of the Company is responsible for establishing and maintaining an internal control structure and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of controls, and of the practices and procedures referred to in the preceding paragraph, and to assess whether those practices and procedures can be expected to achieve the SEC's above-mentioned objectives. Two of the objectives of internal control and the practices and procedures are to provide management with reasonable, but not absolute, assurance that assets for which the Company has responsibility are safeguarded against loss from unauthorized use or disposition, and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in accordance with generally accepted accounting principles. Rule 17a-5(g) lists additional objectives of the practices and procedures listed in the preceding paragraph.

Board of Director and Shareholders
First Western Securities, Inc.
Page 2
August 23, 2002

Because of inherent limitations in internal control or the practices and procedures referred to above, error or fraud may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

Our consideration of internal control would not necessarily disclose all matters in internal control that might be material weaknesses under standards established by the American Institute of Certified Public Accountants. A material weakness is a condition in which the design or operation of the specific internal control components does not reduce to a relatively low level the risk that error or fraud in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. However, we noted no matters involving internal control, including control activities for safeguarding securities that we consider to be material weaknesses as defined above.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the SEC to be adequate for its purposes in accordance with the Securities Exchange Act of 1934 and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Company's practices and procedures were adequate at June 30, 2002, to meet the SEC's objectives.

This report is intended solely for the use of the Board of Directors, management, the SEC, and other regulatory agencies that rely on Rule 17a-5(g) under the Securities Exchange Act of 1934 in their regulation of registered brokers and dealers, and is not intended to be and should not be used by anyone other than these specified parties.

Sanford, Baumeister & Frazier, P.C.

SANFORD, BAUMEISTER & FRAZIER, P.C.